



GEORGETOWN UNIVERSITY

February 8, 2019

Chief Judge Leonard Stark
J. Caleb Boggs Federal Building
8444 N. King Street
Unit 26, Room 6124
Wilmington, DE 19801-3555

Re: U.S. vs. Yung, Criminal Action No. 18-14-LPS

Dear Chief Judge Stark,

With respect to the above-referenced matter, I submit the following victim impact statement on behalf of Georgetown University. We respectfully ask the court to consider this statement and those of the other victims when sentencing Mr. Yung.

Georgetown University was severely impacted by the actions of Mr. Yung. For over 18 months prior to his arrest, Mr. Yung waged a relentless campaign designed to terrorize particular targets at Georgetown University and affiliated with Georgetown University after Mr. Yung was denied admission to Georgetown University Law Center. Mr. Yung also engaged in efforts to defame the university and – of greatest concern – engaged in multiple efforts to incite unwitting third parties to engage in violence against those university-affiliated targets. Prior to arrest and detention, Mr. Yung’s behaviors – which he engaged in and orchestrated while he was a law student in Texas -- created an acute and ongoing safety risk for the university and for other victims that Mr. Yung targeted, all apparently because he was not admitted to Georgetown Law. It is my considered professional opinion that Mr. Yung will resume posing an acute and ongoing risk of violence and cyberstalking to Georgetown University as well as to the other victims in this matter upon release, and potentially to new victims, unless the court is able to impose certain specific penalties and retain prolonged leverage over Mr. Yung’s behavior following release.

Georgetown University first became aware of Mr. Yung’s activities in October 2015 through reports from employees and students at Georgetown University’s Law Center, who became aware of accusations made in online reviews of the Law Center by someone posing as a female Law Center applicant who accused Victim 1 of sexually assaulting her during her alumni interview in Delaware. Around the same time, Victim 1 became aware of the same accusations and alerted the Law Center as well. We immediately conducted an internal investigation into the applicants assigned to Victim 1 and determined that Victim 1 had not been assigned to interview any female

applicants during that year. Upon additional investigation, we were able to rule out the sexual assault accusation as bogus and we were able to help identify Mr. Yung, an applicant who was denied admission to Georgetown Law and had been interviewed by Victim 1, as the most likely applicant to have engaged in this online impersonation and defamatory claims.

Through Victim 1 and through the federal investigation conducted by the FBI into Mr. Yung's activities, we learned that Mr. Yung had engaged in extensive, pervasive, and relentless efforts for over 18 months to terrorize, harass, impersonate, cyberstalk, and defame Victim 1, his family, his co-workers, and Georgetown University. We learned from Victim 1 that Mr. Yung posted false messages on websites that were lewd, vulgar, and defamatory regarding Victim 1, his family, and Georgetown University. We also learned from the FBI investigation that in one case, Mr. Yung posted information online that manipulated a third party to physically show up at Victim 1's house with the intent to sexually assault the wife of Victim 1. We further learned from the FBI investigation that Mr. Yung engaged in repeated efforts to manipulate others into showing up at targeted locations and engage in violence. Victim 1 informed us that he was fearful for his safety and his family's safety (including for his son who was a student at Georgetown University at the time).

Upon receiving notice of the situation, Georgetown University initiated a Threat Assessment team review. That review consisted of gathering and analyzing information from Victim 1 and speaking to the law enforcement officers and investigators working on the case. We continued to update this threat assessment review through the duration of the investigation including through Mr. Yung's arrest and detention. Based on that review, Georgetown University remains significantly concerned that Mr. Yung will pose a risk of violence- directly or through a third party- when released from custody unless certain provisions are imposed by the court. Mr. Yung began his harassment of Victim 1 and Georgetown University after he was denied admission to Georgetown Law. His actions were unprovoked and we believe that his actions indicate a perceived injustice and an intense need to retaliate for not being accepted to the law school. We are extremely concerned that his desire to seek revenge on Victim 1 (and his family) and on Georgetown University / Georgetown Law will only increase now that he has been arrested, detained, pleaded guilty, and sentenced for these crimes. Importantly, Mr. Yung has carried out his exhaustive campaign of harassment, defamation, and stalking from a remote location through Internet access and social engineering, while several hundred miles away. He also did so while a law student at another school, with full knowledge of the illicit nature of his activities and the federal sentences involved. Most importantly, the only measures that succeeded in stopping Mr. Yung's campaign of harassment and stalking were arrest and detention.

Mr. Yung's vicious, extensive, pervasive, and relentless stalking of the victims in this case represent the worst stalking case I have encountered in my 25 years as a threat assessment professional and across the thousands of stalking and threat investigations I have worked

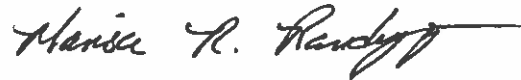
throughout my career. My opinion is based upon my extensive professional experience. While I currently serve as Director of Threat Assessment for Georgetown University, I previously served with the U.S. Secret Service, most recently as the agency's Chief Research Psychologist. I am recognized as one of the country's leading experts in threat assessment and the prevention of targeted violence and stalking. My work and that of my co-authors is used throughout the federal, state, and local law enforcement communities to prevent stalking, domestic violence, campus violence, school shootings, workplace shootings, and other violence directed at identifiable targets.

Prior to Mr. Yung's arrest, Georgetown University had to deploy significant safety measures to protect the university and Victim 1's son while he was enrolled at Georgetown University. When Mr. Yung is released, the university will have to again deploy additional safety measures to guard against the threat that we believe Mr. Yung will pose to the university again. We request that the court consider adding the following provisions in sentencing Mr. Yung, to help keep all of the victims in this matter – and any future victims that Mr. Yung may try to target – safe from Mr. Yung's predatory behavior and efforts to manipulate others to engage in violence. Specifically, we request the following sentencing provisions:

- Extended supervised release for as long as sentencing guidelines permit, with the maximum upward departure allowable;
- Court-ordered full psychological evaluation or full psychiatric evaluation with report to the court regarding any diagnosis and treatment recommendations. Court-ordered mental health treatment – in whatever form recommended by the court-ordered evaluation.
- Lifetime protective order prohibiting physical entry to all Georgetown properties and prohibiting any contact with (including through third parties or social media/Internet platforms), and mandatory distance from, all victims, including all Georgetown University campuses, employees, volunteers, and students. If a lifetime protective order is not feasible, then we request a protective order for the duration of extended supervised release;
- Ankle bracelet monitoring;
- No Internet access for duration of extended supervised release;
- No economic gain from his crimes;
- No supervised release to any family living in Delaware;
- Court-ordered removal of all content posted by Mr. Yung about every victim, including Georgetown University;
- Notice to all victims if Mr. Yung applies for admission to the bar in any state in the U.S.

We appreciate the court's consideration of this statement in support of sentencing and release conditions for Mr. Yung. We have requested these provisions to help reduce the ongoing risk that Mr. Yung poses to all victims involved.

Very truly yours,

A handwritten signature in black ink, reading "Marisa R. Randazzo" with a stylized flourish at the end.

Marisa Reddy Randazzo, Ph.D.
Director of Threat Assessment